

## **REMARKS/ARGUMENTS**

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application into condition for allowance. The present amendment is being made to facilitate prosecution of the application.

### **I. STATUS OF THE CLAIMS AND FORMAL MATTERS**

Claims 2-7 and 32-37 are pending in this application. Claims 2, 4, 6, 32, 34 and 36, which are independent, are hereby amended. Claims 1, 8-31, and 38-53 have been canceled without prejudice or disclaimer of subject matter. No new matter has been introduced by this amendment. Support for this amendment is provided throughout the Specification. Changes to claims are not statements with respect patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112 beyond the remarks herein. Rather, these changes are made simply for clarification and to round out the scope of protection to which the Applicants are entitled.

### **II. SUPPORT IN THE SPECIFICATION**

Support for this amendment is provided at paragraphs [0115] and [0119] of the Specification as originally filed, which are reproduced below:

[0115] The feature information calculating unit 66 calculates four components of motion as a whole of the frame at time  $t$ , that is, the horizontal component  $u$ , the vertical component  $v$ , the zooming component  $v_{\text{zoom}}$ , and the rotation component  $v_{\text{rot}}$ , in accordance with the formulas described below.

[0119] Although the respective components are determined by simply calculating the means values of 25 motion vectors, weighting on the basis of the locations on the screen may be performed.

## II. REJECTIONS UNDER 35 U.S.C. §102(e) and 35 U.S.C. §103(a)

Claims 2, 4, 6, 32, 34, and 36 were rejected under 35 U.S.C. §102(e) over U.S. Patent No. 7,031,384 to Kondo, et al. (hereinafter, merely "Kondo").

Claims 2, 4, 6, 32, 34, and 36 were rejected under 35 U.S.C. §103(a) over U.S. Patent No. 6,366,701 to Chalom, et al. (hereinafter, merely "Chalom") in view of U.S. Patent No. 5,486,141 to Ohga, et al. (hereinafter, merely "Ohga").

Claims 3, 5, 7, 33, 35, and 37 were rejected under 35 U.S.C. §102(e) over U.S. Patent No. 7,031,384 to Kondo, et al. (hereinafter, merely "Kondo") in view of U.S. Patent No. 6,119,109 to Muratani, et al. (hereinafter, merely "Muratani").

## III. RESPONSE TO REJECTIONS

Claim 2, recites, *inter alia*:

...wherein, when the image data is output, a horizontal component, a vertical component, a rotational component and zoom component motion data generated from the motion vectors detected from the image data being output are weighted, synchronized and output.

As understood by Applicants Kondo does not disclose a receiving unit for receiving a request from a user.

Furthermore, Applicants submit the combination of Chalom and Ohga fail to teach or suggest the above-identified features of claim 2.

Specifically, Applicants submit that the Office Action concedes that Chalom fails to teach the motion presenting unit. However, the Office Action cites a portion of Chalom, specifically column 5, lines 9-31, as disclosing a feature of the motion presenting unit.

Applicants submit that the cited portion of Chalom suggests a six parameter model that may be more effective in predicting motions such as translation, scaling, and rotation.

The combination of Chalom and Ohga fails to teach or suggest a motion presenting unit for outputting an image and motion as a function of the received image data, ID data, and motion data, wherein, when the image data is output, a horizontal component, a vertical component, a rotational component and zoom component motion data generated from the motion vectors detected from the image data being output are weighted, synchronized and output.

Therefore, claim 2 is patentable.

For reasons similar to those described above, independent claims 4, 6, 32, 34, and 36 are also patentable.

#### **IV. DEPENDENT CLAIMS**

The other claims in this application are each dependent from one of the independent claims discussed above and are therefore believed patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

### CONCLUSION

Because Applicants maintain that all claims are allowable for at least the reasons presented hereinabove, in the interests of brevity, this response does not comment on each and every comment made by the Examiner in the Office Action. This should not be taken as acquiescence of the substance of those comments, and Applicants reserve the right to address such comments.

In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited references, it is respectfully requested that the Examiner specifically indicate the portion, or portions, of the reference, or references, providing the basis for a contrary view.

In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

Respectfully submitted,  
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